

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

1. **DAVID COKE**, a/k/a "Slime,"
 2. **MICHAEL COKE**, a/k/a "Dirty Mike,"
 3. **FRANCISCO ARIAS**, a/k/a "Emilio
Perez,"
 4. **LARRY BAILEY**,
 5. **ANTHONY CALDWELL**, a/k/a "AC,"
 6. **MEMOGNE LAMOTHE**, a/k/a "Maemo"
and a/k/a "Mizz," and
 7. **MICHAEL MCNEILL**, a/k/a "Murder
Mike," and a/k/a "M-3,"
- Defendants.

Cr. No.

VIOLATIONS:

21 U.S.C. § 846 –
Conspiracy to Distribute Cocaine
Base, Cocaine, and Heroin

21 U.S.C. § 853 --
Criminal Forfeiture Allegation

INDICTMENT

COUNT ONE: (Title 21, United States Code, Section 846 -- Conspiracy to Distribute
Cocaine Base, Cocaine, and Heroin)

The Grand Jury charges that:

From a time unknown to the Grand Jury and continuing until on or about June 16, 2015, at
Boston, Randolph, Stoughton, Braintree, and elsewhere in the District of Massachusetts, and at
other places presently known and unknown:

1. **DAVID COKE**, a/k/a "Slime,"
2. **MICHAEL COKE**, a/k/a "Dirty Mike,"
3. **FRANCISCO ARIAS**, a/k/a "Emilio
Perez,"
4. **LARRY BAILEY**,
5. **ANTHONY CALDWELL**, a/k/a "AC,"
6. **MEMOGNE LAMOTHE**, a/k/a "Maemo"
and a/k/a "Mizz," and
7. **MICHAEL MCNEILL**, a/k/a "Murder Mike," and a/k/a
"M-3,"

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with other persons known and unknown to the Grand Jury, to distribute, and to possess with intent to distribute cocaine, a Schedule II controlled substance, cocaine base, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The Grand Jury further charges that the conspiracy described herein involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii). Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(ii), is applicable to this count.

The Grand Jury further charges that 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, are attributable and were reasonably foreseeable to defendants **DAVID COKE** and **FRANCISCO ARIAS**. Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(ii), is applicable to this count as to these two defendants.

The Grand Jury further charges that 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, is attributable and were reasonably foreseeable to defendants **LARRY BAILEY** and **MEMOGNE LAMOTHE**. Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(ii), is applicable to this count as to these two defendants.

The Grand Jury further charges that the conspiracy described herein involved 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(iii).

Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(iii), is applicable to this count.

The Grand Jury further charges that 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, are attributable and were reasonably foreseeable to defendants **DAVID COKE, MICHAEL COKE, ANTHONY CALDWELL, and MICHAEL MCNEILL**. Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(iii), is applicable to this count as to these four defendants.

The Grand Jury further charges that the conspiracy described herein involved 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(i). Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(i), is applicable to this count.

The Grand Jury further charges that 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, are attributable and were reasonably foreseeable to defendant **DAVID COKE**. Accordingly, Title 21, United States Code, Section 841(b)(1)(B)(i), is applicable to this count as to this defendant.

All in violation of Title 21, United States Code, Section 846.

DRUG FORFEITURE ALLEGATION
(Title 21, United States Code, Section 853)

The Grand Jury further charges that:

1. As a result of the offense alleged in Count One of this Indictment:

1. **DAVID COKE**, a/k/a “Slime,”
2. **MICHAEL COKE**, a/k/a “Dirty Mike,”
3. **FRANCISCO ARIAS**, a/k/a “Emilio Perez,”
4. **LARRY BAILEY**,
5. **ANTHONY CALDWELL**, a/k/a “AC,”
6. **MEMOGNE LAMOTHE**, a/k/a “Maemo” and a/k/a “Mizz,” and
7. **MICHAEL MCNEILL**, a/k/a “Murder Mike,” and a/k/a “M-3,”

defendants herein, shall forfeit to the United States, jointly and severally, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations; and/or any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations, including but not limited to:

- (a) the real property located at 1135 Harrison Avenue, Roxbury, Massachusetts, including all buildings, appurtenances and improvements thereon, more particularly described in a deed recorded at Book 34255, Page 20 at the Suffolk County Registry of Deeds;
- (b) the real property located at 405 Blue Hill Avenue, #411, Dorchester, Massachusetts, including all buildings, appurtenances and improvements thereon, more particularly described in a deed recorded at Book 34255, Page 14 at the Suffolk County Registry of Deeds;
- (c) the real property located at 20 Eugenia Street, Randolph, Massachusetts, including all buildings, appurtenances and improvements thereon, more particularly described in Certificate Number 1140421 recorded at the Norfolk County Land Court;
- (d) one blue 2012 Audi A6 bearing VIN WAUHGAFC9CN051202 and Massachusetts registration 173YK2; and

- (e) one white 2014 Dodge Ram bearing VIN 1C6RR7NT6ES388573 and Massachusetts registration US96RM.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendants –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

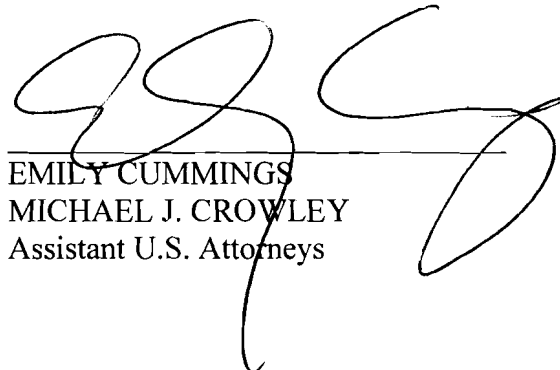
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 1 above, including but not limited to:

- (a) the real property located on Eugenia Street, Randolph, Massachusetts, including all buildings, appurtenances and improvements thereon, more particularly described in Certificate Number 1143178 recorded at the Norfolk County Land Court.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL,


FOREPERSON OF THE GRAND JURY


EMILY CUMMINGS
MICHAEL J. CROWLEY
Assistant U.S. Attorneys

DISTRICT OF MASSACHUSETTS

June 16, 2015

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk

12:12 pm

6/16/15